

EXHIBIT F

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK NWAUZOR,)
FERNANDO AGUIRRE-URBINA,)
individually and on behalf of all)
those similarly situated,)
Plaintiffs,)
vs.) No. 17-cv-05769-RJB
THE GEO GROUP, INC., a Florida)
corporation,)
Defendant.)

Videotaped
Deposition Upon Oral Examination of
ERWIN K. DELACRUZ

9:33 a.m.
Monday, December 2, 2019
1019 Regents Blvd., Suite 204
Fircrest, Washington

REPORTED BY: Keri A. Aspelund, RPR, CCR No. 2661

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1 would week -- or would work?

2 A. It's usually written in -- I -- I think it's
3 written in there it's seven days a week.

4 Q. Is there a time clock for detainee workers to
5 punch in and out of?

6 A. No, they -- when they in-process through the
7 security officer or the desk officer, that's -- that means
8 they're physically there, and then we turn in the -- like a
9 time sheet to the lieutenant's office, and that's forwarded
10 to the work program so they know that they're there.

11 Q. Okay. And the desk officer, I've heard you
12 mention that title a few times, is there a desk officer
13 stationed in the kitchen, or is it someone in the pods?

14 A. It's another cook officer because there's three
15 on each shift; so one cooking, one prepping, and one is a
16 desk officer, or you can call him pod officer.

17 Q. All right. So it's one cook supervisor
18 supervising the cook?

19 A. Mm-hm.

20 Q. One cook supervisor supervising the food
21 preparation?

22 A. Right.

23 Q. And then the third --

24 A. And the -- and the -- and the serving.

25 Q. And the serving?